

I want to express my opposition to RM-10787. This petition is replete with conjecture, egregious misrepresentation and outright falsehood. Its rationale for eliminating CW testing demeans and discredits CW paving the way for dismantling the sub-band allocations reserved for CW and data modes.

CW is both useful and well used on the HF bands and is a distinctive feature of the Amateur Radio Service. It is especially useful for weak-signal, low-power, and ultra-portable operation. Today's radio amateurs have a number of modes available to them, yet a significant portion continues to use CW. The value of CW is not in the past, but in the present. Manufacturers continue to introduce new CW-only radios, and hams buy, assemble [kit models] and use them. For many hams, being a "good neighbor" means running low power to a modest, possibly invisible antenna. Under these constraints, phone operation can be very frustrating, while CW extracts the maximum communication potential/

The current 5 WPM requirement presents a minimal challenge whose administration has not heretofore been noted as a burden to Volunteer Examiners, VEC's or the Commission. For 35 years, the former 13 WPM requirement made me hate CW, so I understand how many feel about *any* code requirement. But as soon as I started to use Morse code, I was addicted, and painlessly, my code speed increased. No ham should be forced to use CW, but every ham should have the opportunity to taste it and make their own judgement. The current tests cover many topics that are of scant use or interest to many operators, but ensure that applicants have a broad understanding of amateur radio and a pathway to expand and deepen their proficiency.